

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: VALSARTAN LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

MDL No. 2875

**Honorable Robert B. Kugler,
District Judge**

[PROPOSED] ORDER

This Documents Relates to All Actions

THIS MATTER having come before the Court upon Wholesaler Defendants' Objections to and Motion to Modify Special Master Order No. 82, and the Court having reviewed the papers submitted by Wholesaler Defendants in support of their objections and motion for modification, and the papers submitted by Plaintiffs in opposition, if any, and the Court having heard oral argument, if any, and the Court having considered the matter and good cause having been shown, IT IS HEREBY **ORDERED** that Wholesaler Defendants' Objections are **SUSTAINED** and Wholesaler Defendants' Motion to Modify Special Master Order No. 82 is **GRANTED**. Plaintiffs TPP Class Representatives and related Assignors are ordered to respond to Wholesaler Defendants' Requests for Production numbers 7, 8, 9, and 11 through 28 and produce previously unproduced relevant responsive documents, identify by Bates number produced responsive documents, and, where appropriate, respond that no relevant responsive documents exist.

This ____ day of _____, 2023.

Robert B. Kugler,
United States District Judge